

From: "DAUGHERTY Katie" <Katie.J.DAUGHERTY@state.or.us>  
To: "Young, Hunter" <Young.Hunter@epa.gov>  
CC: David.J.LACEY <David.J.LACEY@state.or.us>  
madi.novak@state.or.us  
"Peterson, Lance" <peterstone@cdmsmith.com>  
Date: 8/20/2020 2:42:43 PM  
Subject: RE: Arkema 2020 GWET SEE report - Please read 3rd & 4th paragraphs if nothing else  
Attachments: [2020-08-20-0398-DEQ-2020-GWET-SEE-Rpt-comments.pdf](#)

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Hi Hunter,

Please find attached DEQ's comment letter sent to Arkema on the 2020 GWET SEE. I wanted to draw your attention to the 3<sup>rd</sup> and 4<sup>th</sup> paragraphs (also copied below) that discuss the relationship of the GWET system and impacts to in-water work.

Please let me (or Madi) know if you have any concerns or would like to discuss further.

Thanks

Katie

As documented in DEQ's review<sup>1</sup> of the last GWET SEE<sup>2</sup>, the existing groundwater extraction system is not capable of achieving or sustaining the required inward gradients and the treatment plan remains unreliable. The adaptive management modifications implemented over the past year have been ineffective in increasing the groundwater extraction rate. Migration of contamination around and possibly under the wall remains an ongoing concern given the lack of hydraulic control. Anticipated plans for modifications to management of groundwater have not been submitted as planned and continue to be delayed.

The GWET system is unlikely to provide control of the upland source area prior to the implementation of the in-water remedial action. Legacy is completing under the oversight of the U.S. Environmental Protection Agency (EPA). DEQ recommends the in-water remedial design incorporate the lack of upland source control into the in-water design. Future submittals to EPA should acknowledge the failure of the GWET system to control upland sources to the river. In addition, the upland Feasibility Study will need to consider source removal and other remedial options that do not rely on the current GWET system.

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**From:** Young, Hunter <Young.Hunter@epa.gov>  
**Sent:** Monday, July 20, 2020 11:12 AM  
**To:** DAUGHERTY Katie <Katie.J.DAUGHERTY@state.or.us>  
**Cc:** David.J.LACEY <David.J.LACEY@state.or.us>; Peterson, Lance <peterstone@cdmsmith.com>  
**Subject:** RE: Arkema 2020 GWET SEE report

Hello Katie,

Thanks for giving EPA the opportunity to take a look at the 2020 GWET System Effectiveness Evaluation (report) for the Arkema site. EPA has no comments on the report. EPA may provide comments on the GWET system when the supplemental, pending documents mentioned in the report are provided and reviewed. We also see that LSS's Q2 progress report to DEQ mentions upcoming documents evaluating additional groundwater extraction alternatives and a conceptual design for the preferred groundwater extraction alternative. We would appreciate being provided these

documents (and any other relevant documents) as they become available so we can track the GWET status as we plan for the upcoming sufficiency assessment.

Thank you,

Hunter Young  
U.S. Environmental Protection Agency  
Region 10 - Oregon Operations Office  
[Young.Hunter@epa.gov](mailto:Young.Hunter@epa.gov)  
(503)-326-5020

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**From:** DAUGHERTY Katie  
**Sent:** Wednesday, May 20, 2020 3:19 PM  
**To:** Young, Hunter  
**Cc:** David.J.LACEY ; DeMaria, Eva  
**Subject:** Arkema 2020 GWET SEE report

Hi Hunter,

DEQ has received the 2020 GWET System Effectiveness Evaluation for the Arkema site. Since this is a high priority source control measure, DEQ is providing the report to EPA for consideration. Please provide any comments EPA may have to DEQ by June 22, 2020.

(b) (6)

Thank you,  
Katie Daugherty, R.G.  
Project Manager  
NWR Cleanup and Tanks  
Department of Environmental Quality  
700 NE Multnomah St., Suite 600  
Portland, OR 97232  
Phone: 503-229-6748  
[Daugherty.Katie@deq.state.or.us](mailto:Daugherty.Katie@deq.state.or.us)